

Deposition of Lawrence Zimmer - February 3, 2012
Volume II

42

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION (No. VI) MDL Docket No. 875

AHNERT, et al. v. CBS CORPORATION, et al.
10-CV-67443

ANDERSON v. AW CHESTERTON COMPANY, et al.
11-CV-63499

BARKER v. ACANDS, INC., et al.
09-CV-60285

BAUMANN v. AW CHESTERTON COMPANY, et al.
11-CV-63517

BAYLOR v. ACANDS, INC., et al.
10-CV-62057

BIEGANSKI v. ACANDS, INC., et al.
09-CV-60498

BOLTON v. INC., ACANDS, et al.
09-CV-60186

BRAZZONI v. ACANDS, INC., et al.
11-CV-63501

BRESNAHAN, et al. v. ANCHOR PACKAGING CO., et al.
09-CV-60331

COGHLAN v. ACANDS, INC., et al.
10-CV-61461

DUFFEY v. ACANDS, INC., et al.
10-CV-61916

DUFFEY v. ACANDS, INC., et al.
11-CV-63495

EVERARD v. ACANDS, INC., et al.
09-CV-61353

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1 GOTTSACKER v. ACANDS, INC., et al.
10-CV-61885

2 HAKES v. AW CHESTERTON COMPANY, et al.
10-CV-68063

3 HANSEN v. ACANDS, INC., et al.
10-CV-62038

4 HELD v. ACANDS, INC., et al.
10-CV-67814

5

6 HOLCOMB v. ACANDS, INC., et al.
09-CV-61314

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8 IVERSON v. THE ANCHOR PACKING COMPANY, et al.
09-CV-60154

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10 JAKUBOWSKI v. ACANDS, INC., et al.
10-CV-67831

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12 JANICK v. ASBESTOS CLAIMS, et al.
10-CV-61426

13 JOHNSON v. ANCHOR PACKING CO., et al.
09-CV-61599

14

15 LINK, et al. v. ANCHOR PACKING CO., et al.
09-CV-60338

16 MENGERT v. ACANDS, INC., et al.
09-CV-60501

17

18 METZGER v. ACANDS, INC., et al.
09-CV-61322

19 MICHELS v. ACANDS, INC., et al.
10-CV-62047

20

21 MILLER v. ACANDS, INC., et al.
08-CV-89901

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23 MILLER v. A.P. GREEN INDUSTRIES, INC., et al.
09-CV-61040

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09-CV-60519

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1 NELSON v. ACANDS, INC., et al.
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5 REICH v. ACANDS, INC., et al.
09-CV-60523

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7 REPISCHAK v. THE ANCHOR PACKING COMPANY, et al.
09-CV-61335

8

9 RISSE v. ACANDS, INC., et al.
10-CV-67857

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11 SCHEFFEL v. PROCTOR & GAMBLE PAPER PRODUCTS, et al.
09-CV-60545

12

13 SOUJA, et al. v. INC. OWENS-ILLINOIS, et al.
09-CV-60256

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15 STRERATH v. AW CHESTERTON COMPANY, et al.
11-CV-63496

16

17 SUHAYSIK v. ACANDS, INC., et al.
10-CV-61865

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19 WAWIORKA v. ACANDS, INC., et al.
09-CV-60445

20

21 ZIMMER v. ACANDS, INC., et al.
10-CV-61896

22

23 ZUNKER v. ACANDS, INC., et al.
10-CV-67894

24

25

Deposition of LAWRENCE ZIMMER, VOLUME II
Friday, February 3, 2012
10:30 a.m.

at

COUNTRY HEARTH INN
645 East Avenue
Lomira, Wisconsin

Reported by Christine A. Kovac, RPR

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1 The Deposition of LAWRENCE ZIMMER, VOLUME II, a
2 witness in the above-entitled action, taken at the
3 instance of the Plaintiffs, pursuant to the Federal Rules
4 of Civil Procedure, pursuant to notice, before Christine
5 A. Kovac, RPR, Notary Public in and for the State of
6 Wisconsin, at COUNTRY HEARTH INN, 645 East Avenue, Lomira,
7 Wisconsin, on Friday, February 3, 2012, commencing at
8 10:30 a.m. and concluding at 11:41 a.m.

9

10 A P P E A R A N C E S

11

12 CASCINO VAUGHAN LAW OFFICES, LTD, by
13 Mr. Ron Archer
14 220 South Ashland Avenue
15 Chicago, Illinois 60607
16 Appeared on behalf of the Plaintiffs.

17

18 HEPLERBROOM LLC, by
19 Ms. Kaitlyn N. Chenevert
20 150 North Wacker Drive, Suite 3100
21 Chicago, Illinois 60606
22 Appeared on behalf of Georgia-Pacific in the
23 Anderson, Barker, Baumann, Baylor, Bieganski,
24 Bolton, Brazzoni, Coghlan, Duffey, Duffey,
25 Everard, Frisch, Gottsacker, Hakes, Hansen,
Held, Holcomb, Jakubowski, Janick, Mengert,
Metzger, Michels, Miller (08-CV-89901), Miller
(09-CV-60519, Nelson, Ploch, Reich, Repischak,
Risse, Scheffel, Strerath, Suhaysik, Wawiora,
Zimmer, and Zunker cases.

FOLEY & MANSFIELD, PLLP, by
Mr. Jacob D. Sawyer
55 West Monroe Street, Suite 3430
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Appeared on behalf of CBS CORPORATION.

PETERSON, JOHNSON & MURRAY, S.C., by
Mr. J. Ryan Maloney
733 North Van Buren Street
Milwaukee, Wisconsin 53202
Appeared on behalf of Milwaukee Insulation
in the Ahnert case only.

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1 APPEARANCES (Continued):

2

3 GODFREY & KAHN, S.C., by
4 Ms. Erin M. Cook
5 780 North Water Street, Suite 1700
6 Milwaukee, Wisconsin 53202-3590
7 Appeared on behalf of Crane Company.

8

9 CELBA LLC, by
10 Mr. Timothy D. Pagel
11 225 East Mason Street, 5th Floor
12 Milwaukee, Wisconsin 53202
13 Appeared on behalf of Foster Wheeler, LLC
14 in the Ahnert, Anderson (11-CV-63499), Baumann,
15 Duffey (10-CV-61916), Hakes, Iverson, Michels,
16 Scheffel, and Strerath cases only.

17

18 LAVIN, O'NEIL, RICCI, CEDRONE & DISIPIO, by
19 Mr. Matthew H. Ruggles
20 190 North Independence Mall West, Suite 500
21 6th & Race Streets
22 Philadelphia, Pennsylvania 19106
23 Appeared telephonically on behalf of
24 3M Company.

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MARGOLIS EDELSTEIN, by
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only.

FOLEY & MANSFIELD, PLLP, by
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Appeared telephonically on behalf of
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JOHNSON & BELL, LTD., by
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Luse-Stevenson Company in the Hansen case only.

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1 APPEARANCES (Continued):

2 FOLEY & LARDNER, LLP, by

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4 777 East Wisconsin Avenue, 40th Floor

5 Milwaukee, Wisconsin 53202-5300

6 Appeared telephonically on behalf of

7 Union Carbide.

8 DesROCHERS LAW OFFICES, LLC, by

9 Mr. Mark S. DesRochers

10 2800 East Enterprise Avenue

11 Appleton, Wisconsin 54913

12 Appeared telephonically on behalf of

13 USX Corporation f/k/a United States

14 Steel Corporation.

15 WILBRAHAM, LAWLER & BUBA, by

16 Ms. Mary F. Chicorelli

17 1818 Market Street, Suite 3100

18 Philadelphia, Pennsylvania 19103

19 Appeared telephonically on behalf of

20 IU North America and Nosroc Corporation

21 in the Baylor, Bieganski, Duffey, Hansen,

22 Held, Jakubowski, Michels, Risse, and Zunker

23 Cases. On behalf of Nosroc Corporation in

24 the Scheffel case.

25 MURNANE BRANDT, by

Mr. Thomas A. Gilligan, Jr.

30 East Seventh Street, Suite 3200

St. Paul, Minnesota 55101

Appeared telephonically on behalf of

Bechtel Corporation and Cornell Pump

in the Michels and Baumann cases.

Also present: Kay Zimmer

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1 I N D E X

2 EXAMINATION BY PAGE

3 Mr. Archer 49

4 Mr. Sawyer 55

5 Ms. Chenevert 64

6 Mr. Gilligan 84

7 Mr. Archer 90

8 Ms. Chenevert 92

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11 E X H I B I T S

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13 (No exhibits were marked for identification.)

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1 TRANSCRIPT OF PROCEEDINGS

2 MR. ARCHER: We're on the record. It's

3 10:30 a.m. It's February 3rd, 2012. This is the

4 Larry Zimmer deposition continuing.

5 E X A M I N A T I O N

6 BY MR. ARCHER:

7 Q. Larry, I'm going to go through some names of some guys

8 that you worked with. Okay?

9 A. Okay.

10 Q. Louis Frisch?

11 A. Yes.

12 Q. Was he an insulator?

13 A. Yes.

14 Q. Did you work with him out at Badger Ordinance?

15 A. Yes.

16 Q. Would you be able to say if he was -- one way or

17 another if he was exposed to the same -- basically the

18 same things you were exposed to out there?

19 A. Yes.

20 Q. How long? Same time?

21 A. Same.

22 Q. Less? More?

23 A. Probably a little less than me. He was less -- or I

24 was less than he was. On that particular job.

25 Q. How about a fellow by the name of Ed Holcomb?

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1 A. Yeah.

2 Q. Was he an insulator also?

3 A. Yeah.

4 Q. Out of 19?

5 A. Yes. Several jobs.

6 Q. Did you work with him in the 1960's and '70's or no?

7 A. Yes.

8 Q. Did you work with him on jobs where there was drywall

9 work happening?

10 A. Yes.

11 Q. Would you be able to say one way or another if he

12 would -- he was exposed to dust from drywall work --

13 A. Yes.

14 Q. -- including joint compounds?

15 A. Yes.

16 MS. CHENEVERT: Object to form.

17 BY MR. ARCHER:

18 Q. Would you be able to say one way or another if he was

19 exposed to joint compound dust from the three products

20 that we talked about yesterday, you and I?

21 MS. CHENEVERT: Object to form.

22 THE WITNESS: Yes, on my list.

23 BY MR. ARCHER:

24 Q. On your list?

25 How much would it have been? Just days? Weeks?

Page 51	Page 53
<p>1 A. Weeks.</p> <p>2 Q. Months?</p> <p>3 A. At a time.</p> <p>4 MS. CHENEVERT: Object to form.</p> <p>5 THE WITNESS: Different times.</p> <p>6 BY MR. ARCHER:</p> <p>7 Q. How about if you added it up? Would it be months?</p> <p>8 Years? What?</p> <p>9 A. Years.</p> <p>10 Q. How much do you think it would add up to for Holcomb</p> <p>11 that you worked with him in those kinds of conditions?</p> <p>12 A. Number of years.</p> <p>13 Q. How Mr. Richard Iverson? Do you know him?</p> <p>14 A. Yes.</p> <p>15 Q. Was he an insulator also?</p> <p>16 A. Yes.</p> <p>17 Q. Did you work on jobs where drywall work was</p> <p>18 happening --</p> <p>19 A. Yes.</p> <p>20 Q. -- with him?</p> <p>21 A. Yes.</p> <p>22 Q. Would you be able to say the same or different for</p> <p>23 Iverson as you did for Holcomb?</p> <p>24 MS. CHENEVERT: Object to form.</p> <p>25 THE WITNESS: It would be less.</p>	<p>1 he was exposed to the same things you were out there</p> <p>2 or not?</p> <p>3 A. Yes.</p> <p>4 Q. More or less than you?</p> <p>5 A. He was there longer than I was.</p> <p>6 Q. How about Randy or Randall Gottsacker, do you know</p> <p>7 him?</p> <p>8 A. Yes. He was my apprentice.</p> <p>9 Q. He was your apprentice?</p> <p>10 A. Yes.</p> <p>11 Q. When was that?</p> <p>12 A. Oh, I don't know. I can't recall.</p> <p>13 Q. Was it in the '60's or the '70's or when?</p> <p>14 A. It had to be in the '60's, late '60's.</p> <p>15 Q. Did you work with Mr. Gottsacker on jobs where there</p> <p>16 was drywall work going on?</p> <p>17 A. Yes.</p> <p>18 Q. If I asked you the same questions as I did for</p> <p>19 Holcomb, would they be -- would your answers be</p> <p>20 different or the same or what?</p> <p>21 MS. CHENEVERT: Object to form.</p> <p>22 THE WITNESS: About the same.</p> <p>23 BY MR. ARCHER:</p> <p>24 Q. About the same? How would they be different? How</p> <p>25 would your answers be different?</p>
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<p>1 BY MR. ARCHER:</p> <p>2 Q. Less for Iverson?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. How about the same for Raymond Suhaysik?</p> <p>5 A. Yeah.</p> <p>6 Q. Same?</p> <p>7 A. Yes.</p> <p>8 Q. Same as --</p> <p>9 A. Eddie Holcomb.</p> <p>10 Q. Eddie Holcomb?</p> <p>11 MS. CHENEVERT: Object to form.</p> <p>12 BY MR. ARCHER:</p> <p>13 Q. If I asked you the same questions for Suhaysik as I</p> <p>14 did for Holcomb, would they be the different?</p> <p>15 A. About the same.</p> <p>16 MS. CHENEVERT: Object to form.</p> <p>17 BY MR. ARCHER:</p> <p>18 Q. About the same?</p> <p>19 How about Marlan Nelson, do you know that guy?</p> <p>20 A. Yeah.</p> <p>21 Q. Was he also an insulator?</p> <p>22 A. Yes.</p> <p>23 Q. Was he out at Badger Ordinance with you?</p> <p>24 A. Yes.</p> <p>25 Q. Was he -- would you able to say one way or another if</p>	<p>1 A. Well, it might have been a little less.</p> <p>2 Q. A little less for Gottsacker?</p> <p>3 A. Yeah.</p> <p>4 Q. How about a fellow by the name of Oswald Souja?</p> <p>5 A. Yes.</p> <p>6 Q. Was he also an insulator like yourself?</p> <p>7 A. Yes.</p> <p>8 Q. Was he out at Badger Ordinance?</p> <p>9 A. Yes.</p> <p>10 Q. Was he there in the '50's like you were?</p> <p>11 A. Yes.</p> <p>12 Q. Would you be able to say one way or another if he was</p> <p>13 exposed to the same things you were out there as far</p> <p>14 as dust?</p> <p>15 A. Yes. I think he was on the job longer.</p> <p>16 Q. Was he there before you?</p> <p>17 A. Yes.</p> <p>18 MR. ARCHER: All right. Those are all the</p> <p>19 questions I have for you for right now.</p> <p>20 MR. GILLIGAN: Ron, this is Thom Gilligan.</p> <p>21 Could you -- if there's a way to push the speaker just</p> <p>22 a little bit closer to Mr. Zimmer, that would be</p> <p>23 great.</p> <p>24 MR. ARCHER: All right. We'll give it a</p> <p>25 try. His voice is pretty low from the Parkinson's</p>

<p style="text-align: right;">Page 55</p> <p>1 disease. It's tough for him to be real loud.</p> <p>2 MR. GILLIGAN: I understand. And I know --</p> <p>3 I'm not going to ask him to pick up his voice. I just</p> <p>4 was wondering if we could push that closer.</p> <p>5 MR. ARCHER: Yeah, I just did. I mean, but</p> <p>6 only about six inches.</p> <p>7 MR. SAWYER: Hello, sir. Are you ready to</p> <p>8 keep going?</p> <p>9 THE WITNESS: Yeah.</p> <p>10 MR. SAWYER: Okay. If you at any time need</p> <p>11 a break, just let us know and we can take a break.</p> <p>12 It's your show.</p> <p>13 EXAMINATION</p> <p>14 BY MR. SAWYER:</p> <p>15 Q. My name is Jake Sawyer, and I represent Westinghouse</p> <p>16 Electric. I'm going to just ask you some questions</p> <p>17 about your general work history, and then I'm probably</p> <p>18 going to ask you a few questions about Westinghouse.</p> <p>19 I understand that you joined -- joined the union</p> <p>20 in 1958?</p> <p>21 A. Yes.</p> <p>22 Q. Did you -- were you hired in as an apprentice at that</p> <p>23 time?</p> <p>24 A. No. I was a mechanic.</p> <p>25 Q. Okay. Did you have any apprenticeship?</p>	<p style="text-align: right;">Page 57</p> <p>1 trades?</p> <p>2 A. Oh, no.</p> <p>3 Q. Did you ever work as a superintendent?</p> <p>4 A. No.</p> <p>5 Q. While you were a member of the Asbestos Workers Union,</p> <p>6 did you ever receive union publications or</p> <p>7 newsletters?</p> <p>8 A. Yes.</p> <p>9 Q. Did you ever read those newsletters?</p> <p>10 A. Sometimes.</p> <p>11 Q. Do you remember seeing anything in the newsletters</p> <p>12 that discussed the dangers or the use of asbestos?</p> <p>13 MR. ARCHER: Over broad, assumes facts.</p> <p>14 THE WITNESS: I can't recall.</p> <p>15 BY MR. SAWYER:</p> <p>16 Q. Do you remember attending any union meetings where the</p> <p>17 dangers of asbestos were discussed?</p> <p>18 A. Yes.</p> <p>19 Q. Do you remember when those meetings were?</p> <p>20 A. In the '70's.</p> <p>21 Q. And do you remember what was said about the dangers of</p> <p>22 asbestos during those meetings?</p> <p>23 A. Well, the one thing I remember was Sprinkmann & Sons.</p> <p>24 They said that they would -- that it would be caught</p> <p>25 in the hairs of your nose.</p>
<p style="text-align: right;">Page 56</p> <p>1 A. Well, they called us helpers at that time. The</p> <p>2 apprenticeship program was inaugurated at my joining.</p> <p>3 Q. Okay.</p> <p>4 A. They swore me in, and then they passed the -- what you</p> <p>5 call it. That I think was a four-year apprenticeship</p> <p>6 program from then own.</p> <p>7 Q. So that the apprenticeship program was actually</p> <p>8 started after you had joined pretty much?</p> <p>9 A. Yes.</p> <p>10 Q. Did you ever become a foreman?</p> <p>11 A. Yeah.</p> <p>12 Q. Is that a yes?</p> <p>13 A. Yes.</p> <p>14 Q. When did you become a foreman?</p> <p>15 A. Oh, I can't recall.</p> <p>16 Q. Do you remember if it was in the 1970's?</p> <p>17 A. Before that. It would have been in the '60's.</p> <p>18 Q. Did any of your work sites have something called a</p> <p>19 general foreman that actually supervised -- supervised</p> <p>20 a job that you were on?</p> <p>21 A. Well, I was on one, yeah.</p> <p>22 Q. Were you ever a general foreman yourself?</p> <p>23 A. Well, on the jobs that I worked, I was foreman.</p> <p>24 Q. But I guess I mean a general foreman, and that's</p> <p>25 someone who would perhaps supervise foremen of other</p>	<p style="text-align: right;">Page 58</p> <p>1 Q. Did -- do you remember any other meetings when the</p> <p>2 dangers of asbestos were discussed in 1970's?</p> <p>3 A. No.</p> <p>4 Q. Did you ever use a breathing mask --</p> <p>5 A. Yes.</p> <p>6 Q. -- or a respirator?</p> <p>7 And why were you using a breathing mask?</p> <p>8 A. I was working with Kaylo.</p> <p>9 Q. And what kind of breathing mask did you use?</p> <p>10 A. I don't know the name of the brand.</p> <p>11 Q. Was it a paper mask?</p> <p>12 A. No. It was rubber with cloth like -- like a pad.</p> <p>13 Q. Do you happen to recall when you began using those</p> <p>14 masks?</p> <p>15 A. That would be in the '70's someplace.</p> <p>16 Q. And when you began using those masks in the 1970's,</p> <p>17 did you then going forward use those masks on every</p> <p>18 job site?</p> <p>19 MR. ARCHER: Assumes facts, over broad as to</p> <p>20 every.</p> <p>21 THE WITNESS: Used for work relating to the</p> <p>22 things on my list here.</p> <p>23 BY MR. SAWYER:</p> <p>24 Q. So you did not use this mask on every job site that</p> <p>25 you went on then?</p>

<p style="text-align: right;">Page 59</p> <p>1 A. No, because fiberglass come out.</p> <p>2 Q. Okay. Do you remember when the fiberglass came out?</p> <p>3 A. Late '60's.</p> <p>4 Q. Besides possibly the union and the Sprinkmann people,</p> <p>5 did anyone else talk to you about the dangers of</p> <p>6 asbestos while you were working?</p> <p>7 A. Well, it was just kind of a general discussion, you</p> <p>8 know, between ourselves.</p> <p>9 Q. Do you remember when you guys began having those</p> <p>10 discussions?</p> <p>11 A. It would be in the '60's.</p> <p>12 Q. I'd like to now talk about your time at Point Beach,</p> <p>13 which we discussed yesterday. You talked about the</p> <p>14 fabrication shop. And is it correct that the only</p> <p>15 times that you would have been in the fabrication</p> <p>16 shop, you would have just been passing through?</p> <p>17 MR. ARCHER: Over broad, assumes facts.</p> <p>18 BY MR. SAWYER:</p> <p>19 Q. Or did you actually perform work in the fabrication</p> <p>20 shop?</p> <p>21 A. No, I didn't perform work.</p> <p>22 Q. You talked about observing people fabricating</p> <p>23 insulating blankets in that -- in that fabrication</p> <p>24 shop. But you don't know who actually manufactures</p> <p>25 those blankets?</p>	<p style="text-align: right;">Page 61</p> <p>1 tear the insulation?</p> <p>2 A. Yeah. They sewed buttons on it.</p> <p>3 Q. What were the buttons used for if you remember?</p> <p>4 A. To water them down.</p> <p>5 Q. Other than the sewing of the buttons, did these people</p> <p>6 need to tear or cut the insulation before it went into</p> <p>7 the blankets?</p> <p>8 A. Yeah.</p> <p>9 Q. Okay. And for what purpose were they cutting or</p> <p>10 tearing that insulation?</p> <p>11 A. To fit the tubing.</p> <p>12 Q. You said that you were working on duct work</p> <p>13 approximately one floor above the turbine during some</p> <p>14 of the time at Point Beach power house.</p> <p>15 A. Yes.</p> <p>16 Q. Did you actually work on the turbines at Point Beach</p> <p>17 yourself?</p> <p>18 A. No.</p> <p>19 Q. And do you know who manufactured the turbines at Point</p> <p>20 Beach?</p> <p>21 A. Westinghouse.</p> <p>22 Q. And were these turbines being -- being constructed at</p> <p>23 the time that you were there?</p> <p>24 A. I'm not sure.</p> <p>25 Q. Do you remember if the turbines were operational?</p>
<p style="text-align: right;">Page 60</p> <p>1 A. No, I don't.</p> <p>2 MR. ARCHER: Assumes facts, argumentative,</p> <p>3 foundation.</p> <p>4 BY MR. SAWYER:</p> <p>5 Q. It's not -- it's not your recollection that</p> <p>6 Westinghouse manufactured or supplied those blankets;</p> <p>7 is it?</p> <p>8 MR. ARCHER: Same.</p> <p>9 THE WITNESS: I couldn't tell you.</p> <p>10 BY MR. SAWYER:</p> <p>11 Q. Did you ever see whether or not there were any</p> <p>12 specifications provided by Westinghouse for the use of</p> <p>13 these blankets?</p> <p>14 A. The material never came with any explanation.</p> <p>15 Q. And what was the name of the trade who was responsible</p> <p>16 for fabricating the blankets?</p> <p>17 MR. ARCHER: Vague and ambiguous as to</p> <p>18 responsible, assumes facts.</p> <p>19 THE WITNESS: Insulation company I would</p> <p>20 imagine.</p> <p>21 BY MR. SAWYER:</p> <p>22 Q. Okay.</p> <p>23 A. Whoever had the contract.</p> <p>24 Q. In order to insert the actual insulating materials</p> <p>25 into the blankets, did these workers need to cut or</p>	<p style="text-align: right;">Page 62</p> <p>1 A. Yeah, they were operational.</p> <p>2 Q. So were the turbines actually generating electricity</p> <p>3 while you were there?</p> <p>4 MR. ARCHER: Over broad, assumes facts,</p> <p>5 vague and ambiguous as to the turbines, and assumes</p> <p>6 facts as to the turbines.</p> <p>7 BY THE WITNESS:</p> <p>8 Q. While you were at Point Beach, do you remember if any</p> <p>9 of the turbines that were at Point Beach were</p> <p>10 generating electricity?</p> <p>11 A. Well, yeah, because it was like an add-on.</p> <p>12 Q. Okay. And were your job responsibilities limited to</p> <p>13 the part of the facility that was the add-on?</p> <p>14 A. Yep.</p> <p>15 Q. So that would have been new construction of whatever</p> <p>16 was in the add-on area?</p> <p>17 A. Yes.</p> <p>18 MR. ARCHER: Lacks foundation, assumes</p> <p>19 facts. Misstates his testimony.</p> <p>20 BY MR. SAWYER:</p> <p>21 Q. Do you specifically remember what work was being</p> <p>22 performed on the turbines at Point Beach while you</p> <p>23 were there?</p> <p>24 A. I can't recall.</p> <p>25 Q. Do you specifically recall ever working on a</p>

<p style="text-align: right;">Page 63</p> <p>1 Westinghouse turbine yourself?</p> <p>2 A. No. I can't recall.</p> <p>3 Q. Do you remember how long -- strike that.</p> <p>4 To go back to the fabrication shop, do you</p> <p>5 remember how long it would have taken for these</p> <p>6 workers to completely fabricate a blanket for use on a</p> <p>7 turbine?</p> <p>8 A. They would spend several days on it.</p> <p>9 Q. And that would have included cutting the blanket to</p> <p>10 size, sewing the buttons on, as well as inserting the</p> <p>11 insulation into the blanket?</p> <p>12 MR. ARCHER: Assumes facts.</p> <p>13 THE WITNESS: I don't know. It wasn't my</p> <p>14 job.</p> <p>15 MR. SAWYER: I think that those are all the</p> <p>16 questions that I have for you, sir. I really</p> <p>17 appreciate your time.</p> <p>18 THE WITNESS: You're welcome.</p> <p>19 MS. CHENEVERT: Sir, can you hear me okay</p> <p>20 from here, or would you like me to move up?</p> <p>21 THE WITNESS: No, I can hear you.</p> <p>22 MS. CHENEVERT: Okay. Great.</p> <p>23 Are you okay to keep going, or would you like to</p> <p>24 take a break?</p> <p>25 THE WITNESS: Sure.</p>	<p style="text-align: right;">Page 65</p> <p>1 A. No.</p> <p>2 Q. And do you recall the month or year that you left the</p> <p>3 Army?</p> <p>4 A. It was six years later.</p> <p>5 Q. Okay. But do you recall the specific month or</p> <p>6 anything?</p> <p>7 A. No.</p> <p>8 Q. Okay. Sir, I want to ask you a few questions about</p> <p>9 the Georgia-Pacific joint compound that you talked</p> <p>10 about yesterday.</p> <p>11 A. Yes.</p> <p>12 Q. I believe you said you recalled seeing it in bags or</p> <p>13 buckets?</p> <p>14 A. Yes.</p> <p>15 Q. Was there a particular packaging that you saw more</p> <p>16 than the other for Georgia-Pacific?</p> <p>17 A. Well, earlier in my career it was the bags. They</p> <p>18 would mix the stuff then up on the job. But then</p> <p>19 later on they came with the buckets, five-gallon</p> <p>20 buckets.</p> <p>21 Q. Do you recall what year you started to see the</p> <p>22 buckets?</p> <p>23 A. No.</p> <p>24 Q. Do you recall what decade you started to see the</p> <p>25 buckets?</p>
<p style="text-align: right;">Page 64</p> <p>1 EXAMINATION</p> <p>2 BY MS. CHENEVERT:</p> <p>3 Q. My name is Kaitlyn Chenevert. I have a few questions</p> <p>4 for you today. I have just a couple more background</p> <p>5 questions for you.</p> <p>6 What is your date of birth?</p> <p>7 A. January 7th, '39.</p> <p>8 Q. And did you graduate from high school?</p> <p>9 A. Yes.</p> <p>10 Q. What high school?</p> <p>11 A. Pius XI.</p> <p>12 Q. Actually, I'm going to move up, so I can hear you a</p> <p>13 little bit better.</p> <p>14 I'm sorry. Would you say that one more time for</p> <p>15 me, sir?</p> <p>16 A. Pius XI. '57.</p> <p>17 Q. You graduated in 1957?</p> <p>18 A. (Affirmative nod of the head.)</p> <p>19 Q. Did you have any other schooling after you graduated?</p> <p>20 A. No.</p> <p>21 Q. I believe you said you joined the Army in 1961. Do</p> <p>22 you recall exactly when you joined? What month or</p> <p>23 what day you joined?</p> <p>24 A. (Negative nod of the head.)</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 66</p> <p>1 A. Say that again.</p> <p>2 Q. Do you recall what decade you started to see the</p> <p>3 buckets in?</p> <p>4 A. What do you mean?</p> <p>5 Q. Was it in the '60's? The '70's? The '80's?</p> <p>6 A. It would be late '60's.</p> <p>7 Q. Late '60's? Okay.</p> <p>8 I'm going to first ask you some questions about</p> <p>9 the bags that you talked about. Do you know what size</p> <p>10 -- like how big the bags were?</p> <p>11 A. They come in 25-pound bags.</p> <p>12 Q. Do you know what the bags were made of?</p> <p>13 A. No.</p> <p>14 Q. Do you recall what color the bags were?</p> <p>15 A. If you showed me one, I could tell you.</p> <p>16 Q. What was that?</p> <p>17 A. If you got a picture of one --</p> <p>18 Q. I don't have any pictures. I'm just wondering if you</p> <p>19 can remember today what color the bags were?</p> <p>20 A. It had black on it, black writing.</p> <p>21 Q. Okay. Was there any -- any way you can recall that</p> <p>22 writing appearing on the bag? Any specific font or</p> <p>23 shape of the letters?</p> <p>24 A. No.</p> <p>25 MR. ARCHER: Compound, vague and ambiguous,</p>

<p style="text-align: right;">Page 67</p> <p>1 and over broad as to any way. 2 THE WITNESS: Printed letters. 3 BY MS. CHENEVERT: 4 Q. Okay. I believe yesterday when you were talking about 5 Georgia-Pacific joint compound, you mentioned a 6 triangle. 7 A. It was on the Gypsum. 8 Q. That was what? 9 A. It was the other -- the USG. 10 Q. Oh, okay. The triangle was on USG? 11 A. Yeah. 12 Q. Okay. Do you recall seeing any logos on the 13 Georgia-Pacific joint compound bags? 14 A. No. 15 Q. Did you ever see the product that was inside of the 16 bag? 17 A. Yes. 18 Q. Could you describe for me what that looked like? 19 A. It was dusty. 20 Q. Do you recall if it was a specific color? 21 A. White. Off white. 22 Q. Do you -- can you recall the first year that you saw a 23 Georgia-Pacific bag of joint compound? 24 A. I couldn't say. 25 MR. ARCHER: What was the answer?</p>	<p style="text-align: right;">Page 69</p> <p>1 THE WITNESS: I couldn't say. 2 BY MS. CHENEVERT: 3 Q. Let's first talk about the metal buckets. Do recall 4 what color those were? 5 MR. ARCHER: Assumes facts that they were 6 one color. 7 BY MS. CHENEVERT: 8 Q. Were they more than one color? 9 A. Yes. 10 Q. Okay. Do you recall what colors they were? 11 A. No, I don't. 12 Q. Did you see any writing on the buckets? 13 MR. ARCHER: Vague and ambiguous, assumes 14 facts. 15 THE WITNESS: Not that I recall. 16 MR. ARCHER: What about the name? 17 THE WITNESS: The name was on it, but I 18 don't know what was written on it. 19 BY MS. CHENEVERT: 20 Q. Do you recall what color the name was in -- was 21 written in? 22 A. I believe it was black. 23 MR. ARCHER: Assumes facts. 24 BY MS. CHENEVERT: 25 Q. Can you describe to me how the name appeared on the</p>
<p style="text-align: right;">Page 68</p> <p>1 COURT REPORTER: I couldn't say. 2 THE WITNESS: I couldn't say. 3 BY MS. CHENEVERT: 4 Q. Can you recall what decade -- pardon me. Strike that. 5 Could you recall what decade was the first time 6 you saw a Georgia-Pacific bag of joint compound? 7 A. In the '70's. 8 Q. Do you recall if that was the early '70's? The middle 9 '70's? The late '70's? 10 A. Early. 11 Q. What was that? 12 A. Early. 13 Q. Early? Okay. 14 Can you recall any specific location where you 15 saw a bag of Georgia-Pacific joint compound? 16 A. I seen them on several jobs. I couldn't pick one out. 17 Q. Now let's talk about the buckets that you talked 18 about, the Georgia-Pacific buckets. I believe you 19 said those were five-gallon? 20 A. Yes. 21 Q. Do you know what the buckets were made of? 22 A. They started out with metal, and they went to plastic. 23 Q. Do you recall when you saw the buckets go from metal 24 to plastic? What year I guess is what I'm saying. 25 MR. ARCHER: Vague and ambiguous.</p>	<p style="text-align: right;">Page 70</p> <p>1 bucket? 2 A. Somebody had written on it. 3 Q. Where on the bucket was the name written? 4 A. On the side. 5 Q. Was that at the top or middle or bottom if you recall? 6 A. Towards the top. 7 Q. Do you recall seeing any logos on the bucket? 8 A. No. No. 9 Q. Did you ever see anyone open the bucket, the metal 10 bucket? 11 A. Yes. 12 Q. How did they do that? 13 A. With pliers or a can opener sometimes. 14 Q. Did you see the product inside of the bucket? 15 A. Eventually. 16 Q. Okay. Do you recall the first time you saw the 17 product inside of the bucket? 18 MR. ARCHER: Vague and ambiguous as to first 19 time you saw. 20 THE WITNESS: I couldn't tell you. 21 BY MS. CHENEVERT: 22 Q. When you say eventually you saw the product inside, 23 what do you mean by that? 24 A. Well, when they started putting it up on the seams on 25 the drywall.</p>

<p style="text-align: right;">Page 71</p> <p>1 Q. Okay. Can you describe to me the color that it was?</p> <p>2 A. Well, when it's wet, it's sort of a grayish color, but</p> <p>3 it dries white.</p> <p>4 Q. Do you know if the product inside of the bucket was</p> <p>5 wet?</p> <p>6 A. Yes.</p> <p>7 Q. Now, you said eventually the buckets went from being</p> <p>8 made of metal to plastic. Is there anything different</p> <p>9 about the description of the plastic bucket?</p> <p>10 MR. ARCHER: Over broad as to anything.</p> <p>11 Assumes facts.</p> <p>12 BY MS. CHENEVERT:</p> <p>13 Q. Well, was it a different size?</p> <p>14 A. I believe that some of them came in seven-gallon</p> <p>15 buckets. They were taller.</p> <p>16 Q. About how tall were the plastic buckets, if you can</p> <p>17 recall?</p> <p>18 A. (Witness is indicating with his hands.)</p> <p>19 Q. Would you be able to estimate for me about how high</p> <p>20 that is, so our court reporter can take that down?</p> <p>21 A. It would be about 14 inches.</p> <p>22 Q. Do you recall what color or colors the bucket -- the</p> <p>23 plastic buckets were?</p> <p>24 A. White.</p> <p>25 Q. Do you recall seeing writing on the buckets, the</p>	<p style="text-align: right;">Page 73</p> <p>1 A. Usually with a screwdriver or can opener.</p> <p>2 Q. Can you recall any specific sites where you remember</p> <p>3 seeing Georgia-Pacific metal buckets of joint</p> <p>4 compound?</p> <p>5 A. I seen them at all different jobs.</p> <p>6 Q. Can you recall any of the names of those specific --</p> <p>7 or any of those jobs?</p> <p>8 MR. ARCHER: Asked and answered.</p> <p>9 THE WITNESS: Just that it was several jobs.</p> <p>10 BY MS. CHENEVERT:</p> <p>11 Q. And the same for the plastic buckets of</p> <p>12 Georgia-Pacific joint compound, can you recall any</p> <p>13 specific jobs where you saw that product?</p> <p>14 A. Several jobs. Most of the jobs I was on.</p> <p>15 Q. But as you sit here today, can you recall any specific</p> <p>16 location?</p> <p>17 MR. ARCHER: Asked and answered, vague.</p> <p>18 BY MS. CHENEVERT:</p> <p>19 Q. I'm sorry. Did you answer? I didn't hear.</p> <p>20 A. I didn't answer.</p> <p>21 Q. Okay. That's fine.</p> <p>22 A. It was on so many jobs. I couldn't pinpoint one.</p> <p>23 Q. Okay. That's fine.</p> <p>24 MR. ARCHER: You want something to drink?</p> <p>25 MS. CHENEVERT: Do you need to take a break?</p>
<p style="text-align: right;">Page 72</p> <p>1 plastic buckets?</p> <p>2 A. I'm not sure.</p> <p>3 Q. Okay. Did you see any other -- any other colors on</p> <p>4 the plastic buckets besides white that you can recall?</p> <p>5 MR. ARCHER: Over broad as to any others,</p> <p>6 assumes facts.</p> <p>7 THE WITNESS: Not that I can recall.</p> <p>8 BY MS. CHENEVERT:</p> <p>9 Q. Do you recall seeing any logos on the plastic buckets?</p> <p>10 A. No.</p> <p>11 Q. Did you ever see the product that was inside the</p> <p>12 plastic bucket?</p> <p>13 A. Yes.</p> <p>14 Q. Can you describe for me what that product looked like?</p> <p>15 A. It was grayish.</p> <p>16 Q. Was it wet?</p> <p>17 A. Yes.</p> <p>18 Q. You said that these plastic buckets were a little bit</p> <p>19 taller. Do you know, did they weigh more than the</p> <p>20 metal buckets?</p> <p>21 A. I don't know how much they weighed.</p> <p>22 Q. Okay. Did you ever see anyone open up the plastic</p> <p>23 buckets?</p> <p>24 A. Sure.</p> <p>25 Q. Can you describe how they did that?</p>	<p style="text-align: right;">Page 74</p> <p>1 Are we okay?</p> <p>2 THE WITNESS: I just have to swallow some</p> <p>3 pills.</p> <p>4 MRS. ZIMMER: He has to take his pills.</p> <p>5 MS. CHENEVERT: Do you want to take a quick</p> <p>6 break?</p> <p>7 MR. ARCHER: Yeah. Let's go off while he</p> <p>8 does that.</p> <p>9 It's 11:07. We're off the record.</p> <p>10 (A brief pause in proceedings.)</p> <p>11 MR. ARCHER: It's 8 after 11. This is the</p> <p>12 Larry Zimmer deposition. We're back on the record.</p> <p>13 BY MS. CHENEVERT:</p> <p>14 Q. Sir, I just have a few questions about the work that</p> <p>15 you saw the drywallers do at these different jobs</p> <p>16 sites. Were there -- were there times when you were</p> <p>17 working around the drywallers where they were not</p> <p>18 sanding?</p> <p>19 A. Sure.</p> <p>20 Q. About how often would that be the case that they</p> <p>21 weren't sanding?</p> <p>22 A. Well, it would be every day until they got to that</p> <p>23 point where they applied that joint compound, and then</p> <p>24 they let it dry for a day, and then they would sand</p> <p>25 it.</p>

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1 Q. So some of the time the drywallers would be applying
2 the joint compound?
3 A. Yes.
4 Q. Okay. Can you estimate for me the percentage of time
5 that you saw them applying the joint compound as
6 opposed to sanding the joint compound?
7 A. No.
8 Q. Do you recall any of the names of the drywallers that
9 you had worked around at any of these sites?
10 A. (Negative nod of the head.)
11 Q. Do you know any names of any employers of drywallers
12 that worked at these sites?
13 A. They were contracted to the general contractor --
14 Q. Okay.
15 A. -- and I didn't know.
16 Q. Okay. Were the drywallers ever wearing any kind of
17 mask or any protective gear over their mouth?
18 A. No.
19 Q. You mentioned before that you would be wearing a
20 breathing mask when you were working sometimes. Was
21 there ever a time when you were wearing that breathing
22 mask when you were working around drywallers?
23 A. No.
24 Q. Okay. Is there a specific reason you wouldn't wear it
25 around the drywallers?

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1 A. We just weren't aware the problems -- that big a
2 problem.
3 Q. Were there any jobs that you worked on where you
4 weren't working around drywallers at all?
5 A. I don't -- I just -- so many of the jobs you were on,
6 they were all around you.
7 Q. Okay. I have a few questions for you about some of
8 the coworkers that you mentioned earlier today. Mr.
9 Suhaysik?
10 A. Yeah.
11 Q. Do you recall any specific jobs that you had worked
12 with him?
13 A. No. I worked with him on a number of jobs.
14 Q. Do you recall the number of times that you had worked
15 with him?
16 A. Your guess would be as good as mine.
17 MR. ARCHER: Try to give her a -- try to
18 give her a range of jobs, like more than 100 or less
19 than 50 or more than 10 -- something like that.
20 THE WITNESS: Close to 50.
21 He's dead by now.
22 BY MS. CHENEVERT:
23 Q. Okay. Now, at these different jobs sites that you
24 worked with Mr. Suhaysik, do you have a specific
25 recollection of seeing him work around any

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1 Georgia-Pacific products?
2 MR. ARCHER: Vague and ambiguous as to a
3 specific recollection.
4 THE WITNESS: Well, there were other jobs
5 that I was on, so --
6 BY MS. CHENEVERT:
7 Q. Okay. I know you've mentioned that they were on these
8 jobs, but what I'm wondering is, as you sit here
9 today, do you have a specific recollection of seeing
10 Mr. Suhaysik working while others were working with or
11 around these Georgia-Pacific products that you talked
12 about today?
13 A. I saw him working --
14 MR. ARCHER: That's exactly the same
15 question, and it was asked and answered. Go ahead.
16 THE WITNESS: He was working in the same
17 conditions I was.
18 BY MS. CHENEVERT:
19 Q. Mr. Holcomb you mentioned earlier?
20 A. Yes.
21 Q. Do you recall any specific locations where you worked
22 with Mr. Holcomb?
23 A. I was on several jobs with him.
24 Q. Do you recall the number of times that you had worked
25 with Mr. Holcomb?

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1 A. At least probably 20 times.
2 Q. Do you recall the years that you worked with him?
3 A. Well, all through my career.
4 Q. Was it any -- strike that.
5 Was there any particular decade or time that you
6 had worked with him more often than others?
7 A. Not really.
8 Q. As you sit here today, do you have a specific
9 recollection of seeing Mr. Holcomb around while others
10 were working with the Georgia-Pacific joint compound
11 products you talked about today?
12 MR. ARCHER: Vague and ambiguous as to
13 specific recollections, assumes facts.
14 THE WITNESS: I don't recall.
15 BY MS. CHENEVERT:
16 Q. Mr. Gottsacker, I believe you said he was your
17 apprentice?
18 A. Yes.
19 Q. Okay. Did you work with him only when he was your
20 apprentice, or were there other times as well?
21 A. No, there were other times.
22 Q. There were other times you said?
23 A. Other times, yes.
24 Q. Okay. About how long was he your apprentice for?
25 A. I had him about two years on and off.

<p style="text-align: right;">Page 79</p> <p>1 Q. And then after he was no longer your apprentice, can 2 you recall the number of times that you had worked 3 with Mr. Gottsacker? 4 A. It would be about 20 times. 5 Q. Do you recall any specific work site or location that 6 you had worked with Mr. Gottsacker? 7 MR. ARCHER: Vague. 8 THE WITNESS: No. Several jobs. 9 BY MS. CHENEVERT: 10 Q. Did you see -- at these jobs that you were working at 11 with Mr. Gottsacker, were there drywallers around? 12 A. Yes. 13 Q. Was that for all of them or just some of them? 14 A. All of them. 15 Q. Do you have -- as you sit here today, can you recall a 16 specific job where you saw others working with or 17 around Georgia-Pacific products -- 18 MR. ARCHER: Vague as to a specific job. 19 BY MS. CHENEVERT: 20 Q. -- with Mr. Gottsacker? 21 A. He was working with the same stuff I was. 22 Q. And I understand that. I'm just wondering if you have 23 a specific recollection of a certain job site that you 24 saw Georgia-Pacific products at along with Mr. 25 Gottsacker?</p>	<p style="text-align: right;">Page 81</p> <p>1 BY MS. CHENEVERT: 2 Q. Mr. Frisch -- am I saying that correctly? 3 A. Frisch. 4 Q. Do you recall seeing -- when you recall working with 5 him, was there drywall work being done? 6 A. Yes. 7 Q. Do you recall the year that you had worked with Mr. 8 Frisch -- what years? 9 A. I couldn't recall. Not much though. 10 MR. ARCHER: Can you give her an 11 approximation? 12 THE WITNESS: Probably in the late '70's. 13 MS. CHENEVERT: Ron, I have a question for 14 you. For the coworkers listed on this notice that we 15 haven't discussed, will you withdraw those -- will you 16 withdraw Mr. Zimmer as a witness in those cases? 17 THE WITNESS: Yes. Against Georgia Pacific, 18 yes. 19 MR. SAWYER: Would you also withdraw as a 20 witness to Westinghouse? 21 MR. ARCHER: If he doesn't know them, he 22 doesn't know them so, yeah. 23 MR. MALONEY: Could we just withdraw him as 24 to all defendants? 25 MR. ARCHER: No. I'm not going to just give</p>
<p style="text-align: right;">Page 80</p> <p>1 A. I don't recall. 2 Q. And then Mr. Iverson. Do you recall any specific 3 locations that you worked with Mr. Iverson? 4 A. I don't recall. 5 Q. Do you recall the number of times that you had worked 6 with Mr. Iverson? 7 A. Probably ten. 8 Q. Do you recall the years that you had worked with Mr. 9 Iverson? 10 A. It would be in the '70's somewhere. 11 Q. Do you have -- as you sit here today, do you have a 12 recollection of any specific site that you saw Mr. 13 Iverson working where there were Georgia-Pacific 14 products? 15 MR. ARCHER: Vague. 16 THE WITNESS: He was working under the same 17 conditions I was. 18 BY MS. CHENEVERT: 19 Q. And again, I'm just trying to understand if you have 20 any specific recollection of seeing a Georgia-Pacific 21 product at a site where Mr. Iverson was also working? 22 MR. ARCHER: Asked and answered and 23 harassment. You answered the question. It's the same 24 question. 25 THE WITNESS: Same answer.</p>	<p style="text-align: right;">Page 82</p> <p>1 away everything for you guys. These two are the two 2 that are here for real defendants. I don't need to 3 talk to anyone else really. You don't need anything 4 really. He's given no testimony against you, and he's 5 not going to. He would have already if he had it. 6 And that's something you can put in your motions. 7 BY MS. CHENEVERT: 8 Q. Sir, have you ever smoked? 9 A. Yes. 10 Q. What did you smoke? 11 A. Cigarettes. 12 Q. When did you start smoking cigarettes? 13 A. My high school year, my soph -- senior. 14 Q. Do you still smoke now? 15 A. No. 16 Q. When did you quit? 17 A. I stopped when the surgeon general said it wasn't any 18 good. 19 Q. Do you recall what year that was? 20 A. In the '70's I believe. 21 Q. How much did you smoke or how often? 22 A. Well, it was gradual. The most I was smoking was a 23 pack and a half. 24 Q. Is that a pack and a half a day? 25 A. Yeah.</p>

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1 Q. For how long were you smoking a pack and a half a day?
 2 A. I couldn't tell you.
 3 Q. Sir, do you associate asbestos with the
 4 Georgia-Pacific joint compound products we talked
 5 about today?
 6 A. I wasn't aware at the time that it had asbestos in it.
 7 Q. So do you associate asbestos with it today?
 8 A. Yeah.
 9 Q. And what is the basis for your belief that it had
 10 asbestos in it?
 11 A. When they come out and said so.
 12 Q. Do you recall where you heard that?
 13 A. Oh, I couldn't say.
 14 Q. Do you recall when you heard that?
 15 A. Late '70's.
 16 Q. Sir, when you were working around the drywallers,
 17 would there be times when you would be like on the
 18 opposite end of the room from them?
 19 A. Yes.
 20 Q. Okay. About -- what would be the farthest that you
 21 would be away from the drywallers?
 22 MR. ARCHER: Vague, assumes facts.
 23 THE WITNESS: It could be anywhere's from 3
 24 feet to 12 feet.
 25 BY MS. CHENEVERT:

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1 Q. What is it that you would be doing while you were
 2 working around drywallers?
 3 A. Well, it could be anything.
 4 Q. Could you give me an idea of the type of work that you
 5 were doing while you were working --
 6 A. We could be doing plumbing or heating or duct work.
 7 MS. CHENEVERT: Sir, I'm going to take a
 8 quick look through my notes, but I believe those are
 9 all the questions that I have for you right now. I
 10 may have a few follow-ups. But thank you very much
 11 for your time today.
 12 THE WITNESS: You're welcome.
 13 MR. ARCHER: Anybody on the phone?
 14 MR. GILLIGAN: Ron, this is Thom Gilligan.
 15 I have a few questions.
 16 MR. ARCHER: Go ahead.
 17 MR. GILLIGAN: Thank you.
 18 E X A M I N A T I O N
 19 BY MR. GILLIGAN:
 20 Q. Mr. Zimmerman, can you hear me okay?
 21 A. It's Mr. Zimmer.
 22 MR. ARCHER: His name is Zimmer.
 23 MR. GILLIGAN: I'm sorry, Mr. Zimmer.
 24 Q. Can you hear me okay?
 25 A. Yes.

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1 Q. My name is Thom Gilligan. I represent Bechtel and
 2 Cornell. I just have a few questions for you.
 3 I want to ask you about Point Beach, and I just
 4 want to make sure I understand a few things. Were you
 5 at Point Beach for two weeks?
 6 A. Approximately, yes.
 7 Q. And do you remember when it was that you started at
 8 Point Beach?
 9 MR. SAWYER: Objection, asked and answered.
 10 THE WITNESS: I can't recall.
 11 BY MR. GILLIGAN:
 12 Q. Do you remember the year?
 13 MR. SAWYER: Objection.
 14 THE WITNESS: No, I don't.
 15 BY MR. GILLIGAN:
 16 Q. Do you remember who your employer was?
 17 A. No. He was an out-of-town contractor.
 18 Q. But you can't recall the name?
 19 A. No.
 20 Q. And it's my understanding that you were insulating
 21 outside duct. Is that correct?
 22 A. That's correct.
 23 Q. And --
 24 A. Breaching as it's called.
 25 Q. Did you say breaching?

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1 A. Yeah.
 2 Q. And was this breaching from the boiler?
 3 A. I didn't -- at the time I don't know.
 4 Q. The insulation work that you were doing, was that with
 5 fiberglass insulation?
 6 A. It was blanket material, but I don't know if it was
 7 strictly fiberglass or what. It was a dusty stuff.
 8 Q. Were you actually working with blanket material on the
 9 duct work?
 10 A. Yes.
 11 Q. And was that blanket material fabricated on site?
 12 A. No. It came -- it came that way in a box. It was two
 13 feet by four feet.
 14 Q. And was that material supplied to you by your
 15 employer?
 16 A. Yes.
 17 Q. How was it that you would attach this blanket material
 18 to the duct work?
 19 A. We spot weld the duct and put it on with the clips,
 20 metal clips.
 21 Q. Do you know the manufacturer of that material?
 22 A. No, I don't.
 23 Q. Do you remember the building where you were working,
 24 did that have a name?
 25 A. Power house.

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1 Q. At the time that you were working at Point Beach, was
2 there only one power house?
3 A. No. I think there was more than one there. There was
4 more than one.
5 Q. Do you remember whether this was known as a unit, and
6 whether -- if it was known as a unit, whether it had a
7 number designation to it?
8 A. No, I don't.
9 Q. Do you remember which shift you were working on when
10 you were out at Point Beach?
11 A. Day shift.
12 Q. How far was the area where you were working on the
13 outside duct work to the fab shop?
14 A. I recall it was about a floor below us.
15 Q. And was it immediately below where you were working?
16 A. No. It was more inside the building.
17 Q. And my question is how far in distance was the fab
18 shop from where you were working?
19 A. Oh, it was just down one floor and probably six, eight
20 feet from the outside.
21 Q. It's my understanding that the turbine blankets were
22 being constructed in the fab shop. Is that right?
23 A. That's correct.
24 Q. And why was it that you would have to go into the fab
25 shop during the time that you worked at Point Beach?

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1 A. Well, most of the time to get warm. Outside it was
2 cold and windy.
3 Q. Was the area where you were working on the ducts, was
4 that still exposed to the outside?
5 A. Yes.
6 Q. I'm sorry. Was your answer yes?
7 A. Yes.
8 Q. Was there any of the shell, if you will, of the
9 building that had been constructed yet at the time
10 that you were working on the outside duct work?
11 A. What do you mean by that exactly?
12 Q. Yeah, that wasn't a very good question. Let me try
13 again.
14 I take it that the structure had been erected in
15 the area where you were working, but had the outside
16 skin of the building, whether it was metal or brick --
17 A. Yes.
18 Q. -- or other things like that, had that been put up?
19 A. Yes.
20 Q. But you were still exposed to the outside?
21 A. Yes.
22 Q. And if you can describe for me how you were exposed to
23 the outside when you were working there?
24 A. Well, we got on scaffolding and went out, and we had
25 swing stages, which scared the hell out of me I might

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1 add.
2 Q. And I'm just again trying to get a mental picture of
3 where you were working. Were you on the outside of
4 the building --
5 A. Yes.
6 Q. -- when you were working on this duct work?
7 A. Yes.
8 Q. I see. Okay. Thank you.
9 The work that you were doing at Point Beach,
10 were you taking direction from a foreman for your
11 employer?
12 A. From a foreman. I don't recall his name.
13 Q. And was that foreman employed by the same company that
14 you were?
15 MR. ARCHER: Assumes facts, over broad.
16 THE WITNESS: Yeah. I would imagine.
17 BY MR. GILLIGAN:
18 Q. Do you know who the general contractor was for that
19 job?
20 A. No, I don't.
21 MR. GILLIGAN: I think those are all the
22 questions that I have. Thank you, sir.
23 THE WITNESS: You're welcome.
24 MR. ARCHER: Anybody else?
25 (No response was given.)

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1 MR. ARCHER: All right, Larry, we're going
2 to end this thing pretty soon I hope.
3 E X A M I N A T I O N
4 BY MR. ARCHER:
5 Q. You said, when she was asking you questions, that the
6 buckets of joint compound came out, and you started
7 noticing them in the late '60's, right?
8 A. Yeah.
9 Q. But before that, they were using bags. Is that right?
10 A. Yes.
11 Q. But then when she asked you when you first saw bags of
12 joint compounds from Georgia-Pacific, you said the
13 early 1970's. That doesn't make any sense. Did you
14 see the bags of joint compound from Georgia-Pacific
15 before you saw the buckets in the late 1970's?
16 MS. CHENEVERT: Object to form.
17 THE WITNESS: I saw the bags before the
18 buckets.
19 BY MR. ARCHER:
20 Q. Okay.
21 A. The bags came first.
22 Q. I'll live with that.
23 A. Because it was -- I imagine it was an improvement for
24 the companies that it was pre-mixed and they didn't
25 have to have a guy spending time mixing it.

<p style="text-align: right;">Page 91</p> <p>1 Q. Now, I know you talked to your wife last night about 2 your work a little bit. Did you start your career as 3 an insulator earlier in 1957, like in June, '57? Is 4 that a better -- more accurate time? 5 A. June, '57 I worked as a mechanic. 6 Q. Okay. You got in as a mechanic in June, '57? 7 A. Yeah. No, '58. 8 Q. All right. Did you -- 9 A. I started working for L & S in '57. 10 Q. Was that in June, '57? 11 A. Yes. 12 Q. Did you come to that conclusion after thinking it over 13 last night? 14 A. Yes. 15 Q. I've got to ask you too, if you can't recall a 16 specific location where Georgia-Pacific products were 17 during your career, does that mean you never were 18 exposed to Georgia-Pacific products? 19 MS. CHENEVERT: Objection to form, 20 foundation. 21 THE WITNESS: Of course not. 22 BY MR. ARCHER: 23 Q. Do you want to change or take back any testimony that 24 you gave when I was asking you questions yesterday or 25 this morning?</p>	<p style="text-align: right;">Page 93</p> <p>1 re-direct. 2 THE WITNESS: It would all depend on the 3 size of the room. 4 BY MS. CHENEVERT: 5 Q. If you could give me an average about how long that 6 would take? 7 MR. ARCHER: Same. 8 THE WITNESS: I couldn't tell you exactly, 9 no. 10 MS. CHENEVERT: I think that's the only 11 question I have then, sir. Thank you very much for 12 your time. 13 THE WITNESS: Okay. 14 MR. ARCHER: Your deposition is concluded, 15 bud. 16 It is 11:41, and we're going to go off the 17 record. The video of this will be archived at Cascino 18 Vaughn and will be made available for copying upon a 19 reasonable request before trial. 20 That's it. It's 11:41. We're off. 21 22 (Deposition concluded at 11:41 a.m.) 23 24 25</p>
<p style="text-align: right;">Page 92</p> <p>1 A. Not that I'm aware of. That was a mistake with that. 2 MR. ARCHER: Don't worry about it. 3 Those are all the questions I have for you 4 for right now. 5 MS. CHENEVERT: Can I just have a few 6 follow-up? 7 MR. ARCHER: Yeah. You can go right ahead. 8 MS. CHENEVERT: Thanks. 9 THE WITNESS: My wife just informed me that 10 I quit smoking in the late '60's. 11 MR. ARCHER: Larry, do you need anything? 12 Anything to drink or anything like that? 13 THE WITNESS: No. 14 MS. CHENEVERT: I should just be a few 15 questions. 16 MR. ARCHER: Okay. 17 E X A M I N A T I O N 18 BY MS. CHENEVERT: 19 Q. Hi, sir. Katelyn Chenevert again. I just have a few 20 follow-up questions for you here. 21 I just had a couple more questions about the 22 work that the drywallers were doing. When you saw 23 them applying the joint compound to the wall, how long 24 would it take for them to do that? 25 MR. ARCHER: Not within the scope of</p>	<p style="text-align: right;">Page 94</p> <p>1 STATE OF WISCONSIN) 2 MILWAUKEE COUNTY) ss 3 4 I, Christine Kovac, Registered Professional 5 Reporter and Notary Public in and for the State of 6 Wisconsin, do hereby certify that the deposition of 7 LAWRENCE ZIMMER, VOLUME II was recorded by me and 8 reduced to writing under my personal direction. 9 I further certify that said deposition was 10 taken at COUNTRY HEARTH INN, 645 East Avenue, Lomira, 11 Wisconsin, on the 3rd day of February, 2012, 12 commencing at 10:30 a.m. and concluding at 11:41 a.m. 13 I further certify that I am not a relative or 14 employee or attorney or counsel of any of the parties, 15 or a relative or employee of such attorney or counsel, 16 or financially interested directly or indirectly in 17 this action. 18 In witness whereof, I have hereunto set my 19 hand and affixed my seal of office at Milwaukee, 20 Wisconsin, this 6th day of February, 2012. 21 22 <u>Christine Kovac, RPR, and Notary Public</u> 23 <u>In and for the State of Wisconsin</u> 24 My commission expires February 1, 2015. 25</p>

<p>A</p> <p>able (7) 49:16;50:11,18; 51:22;52:25;54:12; 71:19</p> <p>above (1) 61:13</p> <p>accurate (1) 91:4</p> <p>actual (1) 60:24</p> <p>actually (8) 56:7,19;59:19,24; 61:16;62:2;64:12; 86:8</p> <p>add (2) 51:10;89:1</p> <p>added (1) 51:7</p> <p>add-on (3) 62:11,13,16</p> <p>Affirmative (1) 64:18</p> <p>again (5) 66:1;80:19;88:13; 89:2;92:19</p> <p>Against (2) 81:17;82:4</p> <p>ahead (3) 77:15;84:16;92:7</p> <p>along (1) 79:24</p> <p>ambiguous (8) 60:17;62:5;66:25; 68:25;69:13;70:18; 77:2;78:12</p> <p>answered (6) 73:8,17;77:15; 80:22,23;85:9</p> <p>anywhere's (1) 83:23</p> <p>appeared (1) 69:25</p> <p>appearing (1) 66:22</p> <p>applied (1) 74:23</p> <p>applying (3) 75:1,5;92:23</p> <p>appreciate (1) 63:17</p> <p>apprentice (7) 53:8,9;55:22; 78:17,20,24;79:1</p> <p>apprenticeship (4) 55:25;56:2,5,7</p> <p>approximately (2) 61:13;85:6</p> <p>approximation (1) 81:11</p> <p>ARCHER (64) 49:2,6;50:17,23; 51:6;52:1,12,17;</p>	<p>53:23;54:18,24;55:5; 57:13;58:19;59:17; 60:2,8,17;62:4,18; 63:12;66:25;67:25; 68:25;69:5,13,16,23; 70:18;71:10;72:5; 73:8,17,24;74:7,11; 76:17;77:2,14;78:12; 79:7,18;80:15,22; 81:10,21,25;83:22; 84:13,16,22;89:15; 24:90:1,4,19;91:22; 92:2,7,11,16,25;93:7, 14</p> <p>archived (1) 93:17</p> <p>area (4) 62:16;87:12;88:3, 15</p> <p>argumentative (1) 60:2</p> <p>Army (2) 64:21;65:3</p> <p>around (13) 74:17;75:9,22,25; 76:4,6,25;77:11; 78:9;79:11,17;83:16; 84:2</p> <p>Asbestos (10) 57:5,12,17,22; 58:2;59:6;83:3,6,7,10</p> <p>associate (2) 83:3,7</p> <p>assumes (17) 57:13;58:19;59:17; 60:2,18;62:4,5,18; 63:12;69:5,13,23; 71:11;72:6;78:13; 83:22;89:15</p> <p>attach (1) 86:17</p> <p>attending (1) 57:16</p> <p>available (1) 93:18</p> <p>average (1) 93:5</p> <p>aware (3) 76:1;83:6;92:1</p> <p>away (2) 82:1;83:21</p>	<p>11,12,14,19;67:13; 90:9,11,14,17,21</p> <p>basically (1) 49:17</p> <p>basis (1) 83:9</p> <p>Beach (14) 59:12;61:14,16,20; 62:8,9,22;85:3,5,8; 87:1,10,25;89:9</p> <p>Bechtel (1) 85:1</p> <p>become (2) 56:10,14</p> <p>began (3) 58:13,16;59:9</p> <p>belief (1) 83:9</p> <p>below (2) 87:14,15</p> <p>Besides (2) 59:4;72:4</p> <p>better (2) 64:13;91:4</p> <p>big (2) 66:10;76:1</p> <p>birth (1) 64:6</p> <p>bit (4) 54:22;64:13;72:18; 91:2</p> <p>black (3) 66:20,20;69:22</p> <p>blanket (7) 63:6,9,11;86:6,8, 11,17</p> <p>blankets (8) 59:23,25;60:6,13, 16,25;61:7;87:21</p> <p>boiler (1) 86:2</p> <p>bottom (1) 70:5</p> <p>box (1) 86:12</p> <p>brand (1) 58:10</p> <p>Breaching (3) 85:24,25;86:2</p> <p>break (5) 55:11,11;63:24; 73:25;74:6</p> <p>breathing (5) 58:4,7,9;75:20,21</p> <p>brick (1) 88:16</p> <p>brief (1) 74:10</p> <p>broad (8) 57:13;58:19;59:17; 62:4;67:1;71:10; 72:5;89:15</p> <p>bucket (11) 70:1,3,7,9,10,14, 17;71:4,9,22;72:12</p>	<p>buckets (28) 65:13,19,20,22,25; 66:3;68:17,18,21,23; 69:3,12;71:7,15,16, 23,25;72:1,4,9,18,20, 23;73:3,11;90:6,15, 18</p> <p>bud (1) 93:15</p> <p>building (5) 86:23;87:16;88:9, 16;89:4</p> <p>buttons (4) 61:2,3,5;63:10</p>	<p>76:20</p> <p>closer (2) 54:22;55:4</p> <p>cloth (1) 58:12</p> <p>cold (1) 88:2</p> <p>color (10) 66:14,19;67:20; 69:4,6,8,20;71:1,2,22</p> <p>colors (3) 69:10;71:22;72:3</p> <p>companies (1) 90:24</p> <p>company (2) 60:19;89:13</p> <p>completely (1) 63:6</p> <p>compound (19) 50:19;65:9;66:25; 67:5,13,23;68:6,15; 73:4,12;74:23;75:2,5, 6;78:10;83:4;90:6, 14;92:23</p> <p>compounds (2) 50:14;90:12</p> <p>concluded (2) 93:14,22</p> <p>conclusion (1) 91:12</p> <p>conditions (3) 51:11;77:17;80:17</p> <p>constructed (3) 61:22;87:22;88:9</p> <p>construction (1) 62:15</p> <p>continuing (1) 49:4</p> <p>contract (1) 60:23</p> <p>contracted (1) 75:13</p> <p>contractor (3) 75:13;85:17;89:18</p> <p>copying (1) 93:18</p> <p>Cornell (1) 85:2</p> <p>correctly (1) 81:2</p> <p>couple (2) 64:4;92:21</p> <p>course (1) 91:21</p> <p>COURT (2) 68:1;71:20</p> <p>coworkers (2) 76:8;81:14</p> <p>cut (2) 60:25;61:6</p> <p>cutting (2) 61:9;63:9</p>	<p>C</p> <p>call (1) 56:5</p> <p>called (3) 56:1,18;85:24</p> <p>came (8) 59:2;60:14;65:19; 71:14;86:12,12;90:6, 21</p> <p>can (33) 55:11;63:19,21; 64:12;66:19,21; 67:22;68:4,14;69:25; 70:13;71:1,16,20; 72:4,7,14,25;73:1,2, 6,12,15;75:4;79:1,15; 81:10;82:6;84:20,24; 88:22;92:5,7</p> <p>career (4) 65:17;78:3;91:2,17</p> <p>Cascino (1) 93:17</p> <p>case (1) 74:20</p> <p>cases (1) 81:16</p> <p>caught (1) 57:24</p> <p>certain (1) 79:23</p> <p>change (1) 91:23</p> <p>CHENEVERT (46) 50:16,21;51:4,24; 52:11,16;53:21; 63:19,22;64:2,3; 67:3;68:3;69:2,7,19, 24;70:21;71:12;72:8; 73:10,18,25;74:5,13; 76:22;77:6,18;78:15; 79:9,19;80:18;81:1, 13;82:7;83:25;84:7; 90:16;91:19;92:5,8, 14,18,19;93:4,10</p> <p>Cigarettes (2) 82:11,12</p> <p>clips (2) 86:19,20</p> <p>Close (1)</p>	<p>D</p>
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